



**ORANGE  
COUNTY  
WATER  
DISTRICT**

OFFICE OF THE  
GENERAL MANAGER

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June 29, 1998

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Lester Snow  
Executive Director  
CALFED BAY-DELTA PROGRAM  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

**RE: CALFED Draft EIS/EIR**

Dear Mr. Snow:

To date, the CALFED process has been extremely productive. We congratulate you on the fine work that has been accomplished, including the extraordinary effort resulting in the Programmatic EIR/EIS and the public forums held throughout the State.

As the legislative mandated manager of the large aquifer underlying north and central Orange County, the Orange County Water District's (OCWD) particular concern is water quality. Accordingly, we look to the CALFED process to result in a high quality source of water for groundwater recharge in Southern California. This enhanced quality water will assist in reducing the groundwater basin's salinity, thereby protecting the groundwater basin which is the principal source of drinking water for over two million people.

Publicity regarding potential health effects from disinfection by-products and trihalomethanes in particular, has heightened public concern for water quality in general. Elimination and/or reduction in bromides, in an effort to inhibit formation of disinfection by-products in water will alleviate the need for more costly water treatment by Orange County water producers. High-quality water resulting from the CALFED process can contribute to this solution.

Salinity of Colorado River water is an increasing concern as well. The problem has been exacerbated by dairy runoff draining into the Santa Ana River, especially during recent El Nino storm events. The resultant levels of total dissolved solids (TDS) in our groundwater, regardless of origin, could be reduced in the future to some extent by introduction of high quality water resulting from the CALFED process. We feel that reliable, high-quality water is a requirement for our support of any ultimate solution generated by the CALFED process.

We also add our voice to the call for increased supply reliability, the facilitation of water transfers through the Bay-Delta, reasonable cost solutions, conjunctive use and credit for existing, as well as new, reclamation projects.

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Water reliability is a continual concern for Orange County. Imported water supplies a quarter of the demand in our district. Countywide, imported water provides fully half of the need in a normal rainfall year. In the future, our dependence on imported water will increase. While conservation and reclamation are high priorities in our arsenal of management techniques, you can appreciate that confidence in an uninterrupted imported water supply is critical to our basin management planning. We look for any CALFED solution to assure a reliable supply of imported water for Orange County at least equal and hopefully greater than current allocations.

The CALFED solution also should include the capability to accommodate water transfers. This will facilitate a "free market" for water movement and marketing which will benefit all participating parties, free of regulations and jurisdictional disputes. We fully understand that Delta restoration, within reason, is part of this capability.

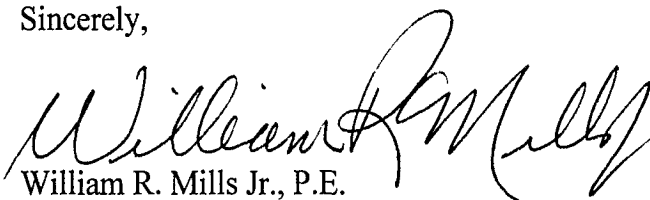
Orange County, and specifically this District, has been an international leader in water reclamation. We are a signatory of the Best Management Practices (BMP's) for water conservation. We have implemented a conservation incentive reward program among our producers. It effectively reduces imported water use. Two points are important to note with regard to water conservation: 1) BMPs must be cost effective as determined at the local level with a certification process similar to the California Urban Water Conservation Council principles; and 2) Orange County should be given credit for all former water conservation and reclamation efforts in determining future water distributions.

OCWD and the Orange County Sanitation District (OCS D) are joint sponsors of a proposed Groundwater Replenishment System project currently under development. The Groundwater Replenishment System is projected to produce 100,000 acre-feet of new water annually to replenish the groundwater basin. Highly treated wastewater will be purified to beyond drinking water standards. This purified water then will be percolated into the basin and stored for later use. When implemented, this System will be the largest reclamation project in the United States.

With regard to conjunctive use, we ask that the final CALFED solution incorporate increased conjunctive use storage in Orange County and Southern California as part of any equation of a preferred alternative, and that CALFED provide grants for funding such projects.

We are willing to pay a fair share of the CALFED solution, including environmental restoration of the Delta. Accordingly, we seek assurances that our concerns as detailed above will be met in a cost effective manner, and that the result of the CALFED process will be a reliable, high-quality water supply for Orange County in the future.

Sincerely,

  
William R. Mills Jr., P.E.  
General Manager



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